

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMES H. FISCHER,  
Plaintiff,

v.

STEPHEN T. FORREST, Jr. SANDRA F.  
FORREST, SHANE R. GEBAUER and  
BRUSHY MOUNTAIN BEE FARM, INC.  
Defendants.

**CIVIL ACTION NO.: 14-CV-1304**

**JOINT PROPOSED SCHEDULING  
DEADLINES**

JAMES H. FISCHER,  
Plaintiff,

v.

STEPHEN T. FORREST, Jr. SANDRA F.  
FORREST, SHANE R. GEBAUER and  
BRUSHY MOUNTAIN BEE FARM, INC.  
Defendants.

**CIVIL ACTION NO.: 14-CV-1307**

**JOINT PROPOSED SCHEDULING  
DEADLINES**

The parties to the above-entitled action jointly submit this JOINT PROPOSED SCHEDULING DEADLINES pursuant to the request of Judge Pitman during the hearing held on February 29, 2016. The proposed discovery deadlines are as follows:

1. Fact discovery shall be completed no later than August 31, 2016. All discovery requests shall be served in time for the responses to be served by this date.
2. Plaintiff shall serve a document identifying by full name, address, and telephone number each person whom Plaintiff expects to call as an expert at trial and certifying written report prepared and signed by the expert pursuant to Fed. R. Civ. P. 26(a)(2)(b) by September 30, 2016.

3. Defendants shall serve a document identifying by full name, address, and telephone number each person whom Defendants expect to call as an expert at trial and certifying written report prepared and signed by the expert pursuant to Fed. R. Civ. P. 26(a)(2)(b) by October 31, 2016.
4. All rebuttal expert reports shall be served by November 18, 2016.
5. Expert disclosure shall be completed no later than December 31, 2016.
6. All dispositive motions shall be exchanged between the parties in accordance with Judge Pitman's individual practices by January 31, 2017.
7. A settlement conference shall be held no later than March 1, 2017.

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Dated: March 4, 2016

Respectfully submitted

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